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Filing date: **12/04/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

|                        |  |
|------------------------|--|
| Proceeding             | 91214091   |
| Party                  | Plaintiff<br>Villanueva Holding Company LLC  |
| Correspondence Address | William D. Raman<br>Fleckman & McGlynn, PLLC<br>P.O. Box 685108<br>Austin, TX 78768-5108<br>UNITED STATES<br>trademarks@fleckman.com, raman@fleckman.com, klbynum@fleckman.com |
| Submission             | Motion to Extend   |
| Filer's Name           | William D. Raman   |
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| Signature              | /William D. Raman/   |
| Date                   | 12/04/2014   |
| Attachments            | Motion for Extension.pdf(18912 bytes )   |

**TRADEMARK**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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|                                  |   |   |
|----------------------------------|---|---|
| VILLANUEVA HOLDING COMPANY, LLC, | § |   |
|                                  | § |   |
| Opposer,                         | § |   |
|                                  | § |   |
| v.                               | § | Opposition Nos. 91214091 (parent case), |
|                                  | § | 91214147                                |
| DAVID REYNOSO URZUA              | § |   |
| A/K/A DAVID REYNOZO              | § |   |
|                                  | § |   |
| Applicant.                       | § |   |

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**MOTION TO EXTEND TIME TO ANSWER COUNTERCLAIM AND TRIAL DATES**

Opposer, Villanueva Holding Company, LLC (“Opposer” or “Villanueva”), moves for an extension of time of thirty days in which to answer or otherwise plead in response to the Counterclaim filed by Applicant, David Reynoso Urzua a/k/a/ David Reynoso (“Applicant” or “Reynoso”). Opposer also requests that all subsequent dates be similarly extended by thirty days. This is the first such motion for extension filed by Opposer.

The undersigned counsel was asked by Villanueva to take over the handling of these consolidated opposition proceedings shortly before the initial November 4, 2014 deadline set by the Board for responding to Applicant’s Counterclaim. Moreover, lead counsel for Opposer is currently engaged in a trial that involves a principal of Villanueva. From the time Counsel for Opposer was asked to take over handling of these opposition proceedings to the present, Counsel for Opposer and the principal of Villanueva have been engaged in trial preparation. Accordingly, Opposer and its counsel have not been able to devote their full attention and time to these

proceedings. The additional requested time is therefore necessary to allow Opposer time to fully evaluate and respond to the claims in Applicant's Counterclaim.

Despite the press of said litigation, Villanueva reached out to Counsel for Applicant during the course of trial with a new counter-offer for settlement. Counsel for Opposer has conferred with Counsel for Applicant to explain the current time constraints resulting from the other litigation and to request consent to a further 30-day extension of the deadlines in these proceedings in view thereof and to enable the parties to continue settlement discussions. The requested consent was not granted.

In view of the facts set forth herein, Opposer submits that there is good cause for the requested extension and respectfully requests that the Board grant this Motion.

Respectfully submitted,

By: /William D. Raman/

William D. Raman  
FLECKMAN & MCGLYNN, PLLC  
P. O. Box 685108  
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ATTORNEY FOR OPPOSER,  
VILLANUEVA HOLDING  
COMPANY, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and complete copy of the foregoing Motion to Extend Time to Answer Counterclaim and Trial Dates has been served upon counsel for David Reynozo on December 4, 2014 by depositing said copy for mailing, via First Class Mail, postage prepaid to:

Wendy Peterson  
Not Just Patents LLC  
P.O. Box 18716  
Minneapolis, MN 55418

/William D. Raman/  
William D. Raman